

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

**LECLAIRRYAN PLLC,

Debtor.**

**Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,**

vs.

**ULX Partners, LLC, UnitedLex
Corporation, and ULX Manager, LLC

Defendants.**

Chapter 7

Case No. 19-34574 (KRH)

Adv. Proc. No. 20-03142-KRH

**DEFENDANTS' MOTION TO FILE PARTIALLY REDACTED OPPOSITION TO
TRUSTEE'S MOTION TO AMEND**

Defendants ULX Partners, LLC (“**ULXP**”), UnitedLex Corporation (“**UnitedLex**”), and ULX Manager, LLC (“**ULXM**”) (collectively, the “**ULX Entities**” or “**Defendants**”), by and through their undersigned counsel, pursuant to Rule 9018 of the Federal Rules of Bankruptcy Procedure, hereby files this Motion to File Partially Redacted Opposition (the “**Motion to Redact**”), with respect to Defendants’ Opposition to the Trustee’s Motion to Amend the First Amended Complaint [Docket No. 169] (the “**Opposition**”). Defendants state the following in support of their Motion to Partially Redact.

1. On February 11, 2022, the Trustee filed her Motion for Leave to Amend the First Amended Complaint [Docket No. 147] (the “**Motion to Amend**”), along with her Motion to File Document Under Seal [Docket No. 149] (the “**Motion to Seal**”), through which the Trustee seeks

leave to file a redacted version of her Motion to Amend and to file her proposed Second Amended Complaint under seal until the Court rules upon such motion. The Trustee provided Defendants with an unredacted version of the Motion to Amend and the proposed Second Amended Complaint.

2. Without conceding whether the information the Trustee seeks to redact and/or seal is proper and reserving all rights with respect thereto, and in the event the Court grants the Trustee's Motion to Seal, the Defendants seek to file their Opposition to the Trustee's Motion to Amend in partially redacted form pending the Court's ruling on the Trustee's Motion to Seal so as not to prematurely disclose any information that the Court may order sealed, and because the Defendants' Opposition includes reference to information, both in the opposition itself and in attached exhibits, that contain information that has been identified as, or derived from, confidential information. Accordingly, Defendants seek entry of a Proposed Order, attached hereto, authorizing the same.

WHEREFORE, Defendants respectfully request that the Court grant this Motion to Partially Redact and allow the partially redacted filing of their Opposition to the Trustee's Motion to Amend on the public docket until such further Order of this Court, and for such other relief as is just and proper.

Dated: March 1, 2022

/s/ Thomas J. McKee, Jr.

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Counsel to the ULX Entities

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2022, I caused a true and correct copy of the foregoing to be served on Ms. Lynn L. Tavenner, as the Chapter 7 Trustee of LeClairRyan PLLC, c/o Quinn Emanuel Urquhart & Sullivan LLP, as the Trustee's special litigation counsel, via electronic mail to: Erika L. Morabito (erikamorabito@quinnemanuel.com) and Brittany J. Nelson (brittanynelson@quinnemanuel.com).

/s/ Thomas J. McKee, Jr.

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